

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Rodger Joseph Gingco

Debtor

CHAPTER 13

Wilmington Savings Fund Society, FSB, d/b/a  
Christiana Trust, not individually but as trustee for  
Pretium Mortgage Acquisition Trust

Movant

NO. 1:14-bk-02837 MDF

vs.

Rodger Joseph Gingco

Debtor

Nature of Proceeding: Motion for Relief

Charles J. DeHart, III Esq.

Trustee

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a second request for a continuance.

Reason for the continuance; both parties are attempting settlement via stipulation with arrears to included in an amended chapter 13 plan.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: December 12, 2016

/s/ Thomas I. Puleo, Esquire

Thomas I. Puleo, Esquire

Attorney for Movant

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